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(Additional Counsel Listed on Following Page)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

HEATHER BOONE and ROXANNE
RIVERA, on behalf of themselves and all
others similarly situated,

Plaintiffs,

CRISTIAN BARRERA, individually,

Plaintiff

v.

AMAZON.COM SERVICES, LLC,

Defendant.

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**JOINT STIPULATION TO EXTEND THE
DEADLINE TO FILE DISPOSITIONAL
PAPERS AND [PROPOSED] ORDER**

Case No. 1:21-CV-00241-ADA-BAM – LEAD
Case No. 1:22-CV-00146-ADA-BAM-MEMBER

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Attorneys for Plaintiff Cristian Barrera

1 Plaintiffs Heather Boone, Roxanne Rivera, and Cristian Barrera and Defendant Amazon.com
2 Services LLC (collectively, the “Parties”), by and through their undersigned counsel of record, hereby
3 stipulate and request as follows:

4 WHEREAS, on August 22, 2023, the Parties submitted a Notice of Settlement informing the
5 Court that they had reached a tentative settlement;

6 WHEREAS, on August 23, 2023, the Court, pursuant to Local Rule 160, ordered that the Parties
7 file appropriate papers to dismiss or conclude this action in its entirety by September 12, 2023;

8 WHEREAS, the Parties need to complete negotiations over the contents of a detailed long-form
9 settlement agreement;

10 WHEREAS, Plaintiffs additionally must prepare a motion for preliminary approval of a class-
11 wide settlement to address the claims of more than 230,000 putative class members;

12 WHEREAS, the Parties are working diligently to complete the necessary dispositional papers
13 to submit to the Court, but, in light of these circumstances above, require additional time to complete
14 that work;

15 WHEREAS, the Parties respectfully submit that good cause exists for an extension of the
16 deadline to file dispositional papers with the Court, *see* Local Rule 160(b);

17 THEREFORE, IT IS STIPULATED AND REQUESTED THAT, by and between the
18 undersigned counsel, and subject to the Court’s approval, good cause exists to extend the
19 September 12, 2023 deadline by 62 days such that the Parties may file appropriate papers to dismiss or
20 conclude this action in its entirety by November 13, 2023.

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1 AGREED TO BY:

2 Dated: September 1, 2023

HODGES & FOTY, LLP

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4 By: /s/ Don J. Foty
Don J. Foty (admitted *pro hac vice*)
5 David W. Hodges (admitted *pro hac vice*)

6 *Attorneys for Plaintiffs Heather Boone and Roxanne*
7 *Rivera*

8 Dated: September 1, 2023

GIBSON, DUNN & CRUTCHER LLP

9 By: /s/ Bradley J. Hamburger
Bradley J. Hamburger
10 Tiffany Phan
Andrew G.I. Kilberg (admitted *pro hac vice*)

11 *Attorneys for Defendant Amazon.com Services LLC*

12 Dated: September 1, 2023

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13 By: /s/ Kyle J. Ignatius
Michael Nourmand
14 James A. De Sario
15 Kyle J. Ignatius

16 *Attorney for Plaintiff Cristian Barrera*
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[PROPOSED] ORDER

Pursuant to the Parties' Joint Stipulation to Extend the Deadline to File Dispositional Papers,

IT IS ORDERED that good cause exists to extend the deadline to file dispositional papers.

The Parties must file dispositional papers no later than November 13, 2023.

Dated this ____ day of _____, 2023.

BARBARA A. MCAULIFFE
UNITED STATES MAGISTRATE JUDGE